



Nuclear Innovation
North America LLC
122 West Way, Suite 405
Lake Jackson, Texas 77566

979-316-3000

January 21, 2013
U7-C-NINA-NRC-130003

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013

Spent Fuel Rack Vendor Change
Impact on Requests for Additional Information and Audit Items

Reference: Letter, Scott Head to Document Control Desk, "Notification of Vendor Change for Spent Fuel Racks," U7-C-NINA-NRC-120071, dated December 6, 2012

By the referenced letter, Nuclear Innovation North America LLC (NINA) indicated that a summary would be provided to describe the impact of the spent fuel rack (SFR) vendor change on the related Requests for Additional Information (RAI) involving fuel rack criticality calculations and the fuel rack structural design and analysis. The RAI letters are 102, 155, 298, 311, 329, 360, 377, 412, 413 and 415. Attachments 1 through 10 provide the impact summary and identify the RAIs that are no longer relevant and should be withdrawn from further staff review. Attachment 11 discusses the impact to SFR Audit Items generated by the staff's SFR Audit of January, 2012. Attachments 12 and 13 provide revised responses to the following RAIs:

09.01.01-3 09.01.01-4

There are no commitments in this letter.

Where changes to the COLA are indicated they will be incorporated in the next COLA revision.

If there are any questions regarding this submittal, please contact me at (979) 316-3011, or Bill Mookhoek at (979) 316-3014.

DO91
MRO

STI 33646537

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/21/13



Scott Head
Manager, Regulatory Affairs
South Texas Project Units 3 & 4

jaa

Attachments:

- 1) Impact of the SFR Vendor Change on RAI Letter No. 102
- 2) Impact of the SFR Vendor Change on RAI Letter No. 155
- 3) Impact of the SFR Vendor Change on RAI Letter No. 298
- 4) Impact of the SFR Vendor Change on RAI Letter No. 311
- 5) Impact of the SFR Vendor Change on RAI Letter No. 329
- 6) Impact of the SFR Vendor Change on RAI Letter No. 360
- 7) Impact of the SFR Vendor Change on RAI Letter No. 377
- 8) Impact of the SFR Vendor Change on RAI Letter No. 412
- 9) Impact of the SFR Vendor Change on RAI Letter No. 413
- 10) Impact of the SFR Vendor Change on RAI Letter No. 415
- 11) Impact of the SFR Vendor Change on Fuel Rack Audit of January, 2012
- 12) RAI 09.01.01-3 Response, Revision 2
- 13) RAI 09.01.01-4 Response, Revision 2

cc: w/o attachment except*
(paper copy)

(electronic copy)

Director, Office of New Reactors
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

*George F. Wunder
*Rocky Foster
*Tom Tai
Charles Casto
U. S. Nuclear Regulatory Commission

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

Jamey Seely
Nuclear Innovation North America

Peter G. Nemeth
Crain, Caton and James, P.C.

Kathy C. Perkins, RN, MBA
Assistant Commissioner
Division for Regulatory Services
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

Richard Peña
Kevin Pollo
L. D. Blaylock
CPS Energy

Alice Hamilton Rogers, P.E.
Inspection Unit Manager
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

*Steven P. Frantz, Esquire
A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave. NW
Washington D.C. 20004

*Rocky Foster
*Tom Tai
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 102 (ML091130281)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.02-1	U7-C-STP-NRC-090051 May 26, 2009 ML091490167	No	Fuel rack material RAI not related to a specific rack design (see Note)

Note: RAI 09.01.02-1 asked two questions about fuel rack materials that were not directed at any specific rack design provided for staff review. Therefore the spent fuel rack vendor change does not affect the response provided in U7-C-STP-NRC-090051, including STPNOC's (NINA's) intent to exclude the use of Boraflex™ in the spent fuel rack.

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 155 (ML091980337)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.01-1	U7-C-STP-NRC-090123 August 28, 2009 ML092450155	No	RAI asked for the new and spent fuel rack criticality calculations of combined license items 9.1.6.1 and 9.1.6.3 and was not directed at any specific new or spent fuel rack design.

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 298 (ML093430391)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.01-2	U7-C-STP-NRC-100004 January 6, 2010 ML100080059	No	RAI asked for the new and spent fuel rack criticality calculations of combined license items 9.1.6.1 and 9.1.6.3 and was not directed at any specific new or spent fuel rack design (follow-up RAI to 09.01.01-1).

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 311 (ML100190710)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.01-3	U7-C-STP-NRC-100101 May 3, 2010 ML101260118	Superseded by Revision 1	See Note below and Comment to letter U7-C-NINA-NRC-110039
	U7-C-STP-NRC-100136 June 14, 2010 ML101670139	Yes	Submitted Revision 0 of WCAP-17246, "South Texas Project Units 3 & 4 Fuel Storage Racks Criticality Safety Methodology Report" which is now withdrawn
	U7-C-STP-NRC-100216 October 11, 2010 ML102870265	Yes	Submitted Revision 1 of WCAP-17246, which is now withdrawn
	U7-C-STP-NRC-100230 October 14, 2010 ML 102910326	Yes	Submitted Revision 0 of WCAP-17311 "Stress Report for STP Units 3 & 4 New Fuel Storage Rack Baseline Design" which is now withdrawn
	U7-C-STP-NRC-100245 October 29, 2010 ML103060041	Yes	Submitted Revision 0 of WCAP-17331 "Stress Report for STP Units 3 & 4 Spent Fuel Storage Rack Baseline Design" which is now withdrawn
	U7-C-STP-NRC-100260 December 9, 2010 ML103490737	Yes	Submitted Revision 1 of WCAP-17311 and 17331 which are withdrawn
	U7-C-NINA-NRC-110004 January 25, 2011 ML 110270170	Yes	Submitted Revision 0 of WCAP-17375 "South Texas Project Units 3 & 4 Fuel Storage Racks with DCD Fuel Design Criticality Safety Methodology Report" which is now withdrawn
	U7-C-NINA-NRC-110039 February 28, 2011 ML110630410	Superseded by Revision 2	Revision 1 superseded Revision 0 and provided new COLA markups. Revision 1 is superseded by Revision 2 (Attachment 12 to this submittal)

Note:

Letter U7-C-STP-NRC-100101 was the initial response to RAI 09.01.01-3 which committed to provide information required by Combined License (COL) Items 9.1.6.1, 9.1.6.2, 9.1.6.3 and 9.1.6.4 and provided Combined License Application (COLA) markups for these COL Items by referencing the WCAPs that would provide the information. The response submitted no technical reports and was later superseded by response Revision 1 and related COLA markups (letter U7-C-NINA-NRC-110039).

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 329 (ML10090109)			
RAI Number	Response Letters	Withdrawn Yes/No	Comments
09.01.01-4	U7-C-STP-NRC-100101 May 3, 2010 ML101260118	Revised by Revision 1	See Note below and Comment to letter U7-C-NINA-NRC-110039
	U7-C-NINA-NRC- 110039 February 28, 2011 ML110630410	Superseded by Revision 2	RAI 09.01.01-4 response Revision 1 revised Revision 0 and provided new COLA markups. Revision 1 is superseded by Revision 2 (Attachment 13 to this submittal)
09.01.01-5	U7-C-STP-NRC-100101	No	Subject is New Fuel Inspection Stand

Note:

Letter U7-C-STP-NRC-100101 was the initial response to RAI 09.01.01-4 which committed to provide information required by Combined License (COL) Item 9.1.6.7 and provided combined License Application (COLA) markups for this COL Item by referencing the WCAP that would provide the information. The response submitted no technical report and was later revised by response Revision 1 and related COLA markups (letter U7-C- NINA-NRC-110039).

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 360 (ML10243014)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.01-6	U7-C-STP-NRC-100216 October 11, 2010 ML102870265	Yes	Provided Revision 1 to WCAP-17246 and related COLA markups.
09.01.01-7	U7-C-STP-NRC-100216	Yes	Technical Question addressed by WCAP-17246, Revision 1
09.01.01-8	U7-C-STP-NRC-100216	Yes	Technical question about WCAP-17246 Revision 0 answered
09.01.01-9	U7-C-STP-NRC-100216	Yes	Technical question about WCAP-17246 Revision 0 answered
09.01.01-10	U7-C-STP-NRC-100216	Yes	Technical question about WCAP-17246 Revision 0 answered
09.01.01-11	U7-C-STP-NRC-100216	Yes	Technical Question addressed by WCAP-17246, Revision 1
09.01.01-12	U7-C-STP-NRC-100216	Yes	Technical Question addressed by WCAP-17246, Revision 1
09.01.01-13	U7-C-STP-NRC-100216	Yes	Technical Question addressed by WCAP-17246, Revision 1
09.01.01-14	U7-C-STP-NRC-100216	Yes	Technical Question addressed by WCAP-17246, Revision 1
09.01.01-15	U7-C-STP-NRC-100216	Yes	Appendix A added to Revision 1 of WCAP-17246 to address all information required by 10CFR50.68

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 377 (ML111260708)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.02-2	U7-C-NINA-NRC-110084 June 23, 2011 ML11178A073	No(NFR) Yes(SFR)	The responses related to removal of the new fuel rack (NFR) remain valid while those for the spent fuel rack (SFR) are withdrawn.
	U7-C-NINA-NRC-110139 November 14, 2011 ML11322A157	Yes	
09.01.02-3	U7-C-NINA-NRC-110084	Yes	
	U7-C-NINA-NRC-110139	Yes	
09.01.02-4	U7-C-NINA-NRC-110105 August 1, 2011 ML11216A224	Yes	
	U7-C-NINA-NRC-110139	Yes	
09.01.02-5	U7-C-NINA-NRC-110084	No(NFR) Yes(SFR)	The responses related to removal of the NFR remain valid while those for the SFR are withdrawn.
	U7-C-NINA-NRC-110139	Yes	
09.01.02-6	U7-C-NINA-NRC-110084	No(NFR) Yes(SFR)	The responses related to removal of the NFR remain valid while those for the SFR are withdrawn.
	U7-C-NINA-NRC-110139	Yes	
09.01.02-7	U7-C-NINA-NRC-110084	No	See Note
09.01.02-8	U7-C-NINA-NRC-110084	Yes	
	U7-C-NINA-NRC-110139	Yes	
09.01.02-9	U7-C-NINA-NRC-110084	Yes	
	U7-C-NINA-NRC-110109 August 17, 2011 ML11234A270	Yes	
	U7-C-NINA-NRC-120013 February 9, 2012 ML12045A504	Yes	

Note: RAI letter No.377 (RAI 09.01.02-7) sought additional information regarding the Quality

Assurance (QA) program and In-Service Inspection (ISI) program as applied to the fuel racks. As such, the response includes generic discussion not related specifically to the withdrawn technical reports and is not withdrawn. The response provided to this RAI by letter U7-C-NINA-NRC-110084 generated RAI 09.01.02-16 (RAI Letter No.413, Attachment 9 of this submittal) and associated response in U7-C-NINA-NRC-110139. In January of 2012, following staff audits of the spent fuel rack design in Rockville, MD, the staff indicated that they considered RAI 09.01.02-7 “closed” and RAI 09.01.02-16 “resolved”. Therefore the responses to RAIs 09.01.02-7 and 9.01.02-16 remain unrevised with the following points noted:

1. In the response to RAI 09.01.02-7, the discussion related to the Westinghouse QA Program is applicable to the Holtec QA Program.
2. In the response to RAI 09.01.02-16, consideration was given to adding descriptive information in the spent fuel rack technical report on how the design accommodated ISI. NINA provided RAI 09.01.02-16 to Holtec for consideration of whether such discussion would be warranted for the Holtec design.

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 412 (ML112420173)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.02-10	U7-C-NINA-NRC-110139 November 14, 2011 ML11322A157	Yes	See Note

Note: RAI Letter No. 412 (RAI 09.01.02-10) was related to spent fuel assembly integrity and the questions were not specific to any particular spent fuel rack design. However, due to the interaction between spent fuel and the racks during design basis seismic ground motion, the response does have to be provided for a specific rack design. The response to RAI 09.01.02-10 made numerous references to the spent fuel rack technical report withdrawn by; Letter, Scott Head to Document Control Desk, "Notification of Vendor Change for Spent Fuel Racks," U7-C-NINA-NRC-120071, dated December 6, 2012. In addition, the response included information proprietary to both Westinghouse and Toshiba. Therefore RAI 09.01.02-10 and the proprietary and nonproprietary responses are withdrawn.

NINA recognizes that RAI 09.01.01-10 is an outline of the detailed information sought by the staff to complete their review. NINA has provided Holtec with RAI 09.01.02-10 so that, where applicable to the Holtec spent fuel rack design, the Holtec technical report includes similar design information.

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 413 (ML112780388)			
RAI Number	Response Letter	Withdrawn Yes/No	Comments
09.01.02-11	U7-C-NINA-NRC-110139 November 14, 2011 ML11322A157	Yes	
09.01.02-12		Yes	
09.01.02-13		Yes	
09.01.02-14		Yes	
09.01.02-15		Yes	
09.01.02-16		No	RAI 09.01.02-16 addresses quality assurance and in-service inspection and is not being withdrawn. See the discussion of RAI 09.01.02-16 in Attachment 7 of this submittal.

Impact of the Spent Fuel Rack Vendor Change on Request for Additional Information (RAI) Letter No. 415 (ML120090142)			
RAI Number	Response Letters	Withdrawn Yes/No	Comments
09.01.02-17	U7-C-NINA-NRC-120013 February 9, 2012 ML12045A504	Yes	
09.01.02-18	U7-C-NINA-NRC-120019 March 6, 2012 ML12069A081	Yes	
09.01.02-19	U7-C-NINA-NRC-120016 dated February 28, 2012 ML12065A425	Yes	
09.01.02-20	U7-C-NINA-NRC-120011 February 8, 2012 ML12041A380	Yes	
	U7-C-NINA-NRC-120016	Yes	See Note
09.01.02-21	U7-C-NINA-NRC-120011	Yes	
09.01.02-22	U7-C-NINA-NRC-120015 February 22, 2012 ML12060A109	Yes	
09.01.02-23	U7-C-NINA-NRC-120011		
	U7-C-NINA-NRC-120020 March 12, 2012 ML12075A190	Yes	Audit Item #10 was provided as a Revision to RAI 09.01.02-23 (see Attachment 11 to this submittal)
09.01.02-24	U7-C-NINA-NRC-120016	Yes	
09.01.02-25	no response provided	N/A	The RAI is no longer relevant
09.01.02-26	U7-C-NINA-NRC-120011	Yes	
09.01.02-27	U7-C-NINA-NRC-120011	Yes	
09.01.02-28	U7-C-NINA-NRC-120013	Yes	
09.01.02-29	U7-C-NINA-NRC-120011	Yes	
	U7-C-NINA-NRC-120016	Yes	
09.01.02-30	no response provided	N/A	The RAI is no longer relevant
09.01.02-31	U7-C-NINA-NRC-120019	Yes	
09.01.02-32	no response provided	N/A	The RAI is no longer relevant

Note: The responses to RAI 09.01.02-20 discussed the assumption that no commodities be located in the gaps between the spent fuel racks and the fuel pool walls. Letter U7-C-NINA-NRC-120016 indicated that the Westinghouse technical report (now withdrawn) would be revised to include discussion of the gap assumption to facilitate future 10CFR50.59 reviews evaluating any changes that could invalidate the assumption. This RAI has been provided to Holtec to review for any similar gap assumptions in the Holtec design.

References:

1. Letter, Scott Head to Document Control Desk, "Notification of Vendor Change for Spent Fuel Racks," U7-C-NINA-NRC-120071, dated December 6, 2012
2. Letter, Ronaldo Jenkins to Mark McBurnett, "Regulatory Audit Summary of South Texas Project, Units 3 and 4 Combined License Application – Chapter 9.1.2, Spent Fuel Rack Structural Analyses," dated August 16, 2012 (ML12192A359)
 - a. Enclosure 1, Spent Fuel Racks Summary Report (ML12201A805)
 - b. Enclosure 2 Spent Fuel Rack Audit Plan
 - c. Enclosure 3 Requests for Information (RAIs) to support the audit activities
 - d. Enclosure 4 list of the NRC staff and NINA team participating in the audit,
 - e. Enclosure 5 Spent Fuel Rack NRC Audit Action Item List (ML12201A845)
 - f. Enclosure 6 Spent Fuel Rack BNL RAI Status Table (ML1220A848)
3. Letter, Scott Head to Document Control Desk, "Response to Requests for Additional Information and Spent Fuel Rack Audit Information," U7-C-NINA-NRC-120015, dated February 22, 2012 (ML12060A109)
4. Letter, Mark McBurnett to Document Control Desk, "Spent Fuel Rack Audit Information," U7-C-NINA-NRC-120020, dated March 12, 2012 (ML12075A190)

This attachment summarizes the impact of the Spent Fuel Rack Vendor change (Reference 1) on the Staff's January 2012 audit of the STP 3 & 4 Spent Fuel Racks (Reference 2).

The staff's audit was specifically focused on technical report WCAP-17331-P, Revision 2, "Structural Analysis Report for STP Units 3 and 4 Spent Fuel Storage Rack Baseline Design." This report was withdrawn by Reference 1 and therefore additional review of the related Requests for Additional Information (RAI) and Audit Action Items (AI) is no longer warranted.

The RAIs related to the audit (Reference 2.c) are summarized in Attachment 10 of this submittal.

Specific information related to some of the AIs was provided to the staff for review. This information is no longer relevant and is also withdrawn. Specifically the following information provided to the staff to support the AIs is withdrawn:

- 1) AIs #10 and #19 involving fuel-to-rack gaps and the SFR buckling calculation (Reference 4) are withdrawn.
- 2) AI #16 involving the STP 3 & 4 Spent Fuel Racks Design Peer Review #2 Meeting Minutes (Enclosure 5 of Reference 3) is withdrawn.

RAI 09.01.01-3

QUESTION:

In response to RAI 2558 (Question 09.01.01-1), the applicant states that the confirmatory criticality analyses will be included in ITAAC 2.5.6.2 along with other items.

The staff does not agree that a future analysis in an ITAAC fulfill the requirements of ABWR COL License Information Items 9.1.6.1 and 9.1.6.3 as described in the response to 09.01.01-1. The staff has issued RAI 4032 (Question 09.01.01-2) requesting the applicant to meet COL Information Items 9.1.6.1 and 9.1.6.3. In addition, the staff is also requesting the applicant to provide the deliverables in COL Information Items 9.1.6.2 and 9.1.6.4 in order for the staff to perform it's safety review.

RESPONSE REVISION 2:

References:

1. Letter, Scott Head to Document Control Desk, "Notification of Vendor Change for Spent Fuel Racks," U7-C-NINA-NRC-120071, dated December 6, 2012
2. Letter, Scott Head to Document Control Desk, "Supplemental Response to Request for Additional Information," U7-C-NINA-NRC-110098, dated July 19, 2011 (ML11202A268)
3. Letter from Scott Head to Document Control Desk, "Response to Request for Additional Information," U7-C-NINA-NRC-10084 dated June 23, 2011 (MLI 1 178A073)
4. Letter, Scott Head to Document Control Desk, "Revised Responses to Requests for Additional Information," U7-C-NINA-NRC-110039, dated February 28, 2011 (ML11322A157)
5. Letter from Scott Head to NRC, "Responses to Requests for Additional Information," dated May 3, 2010, U7-C-STP-NRC-100101 (ML101260118)

RAI 09.01.01-3, Revision 2, is being provided to reflect the change in spent fuel rack vendor described by Reference 1. This revision supersedes the responses provided by References 4 and 5.

The initial response to this RAI (Reference 5) indicated that the vendor information needed to meet COL license Information Items 9.1.6.1 and 9.1.6.2 for the new fuel racks (NFR) and 9.1.6.3 and 9.1.6.4 for the spent fuel racks (SFR) would be provided to support licensing.

The response to RAI 09.01.02-2 on the NFR (Reference 3) indicated that a NFR would not be utilized at STP 3 & 4 and the necessary updates to COL items 9.1.6.1 and 9.1.6.2 (Reference 2) were incorporated into Revision 6 of the STP 3 & 4 Combined License Application (COLA). As discussed in Reference 1, the fuel rack vendor change does not impact the NFR.

For the SFR, Reference 1 indicated that the vendor information required for COL items 9.1.6.3 and 9.1.6.4 will be provided by Holtec International.

As a result of this RAI response, COLA Part 2, Tier 2, Subsections 9.1.6.3, 9.1.6.4 and 9.1.7S will be revised. Changes from COLA Rev.8 are indicated with grey shading as follows:

9.1.6.3 Spent Fuel Storage Racks Criticality Analysis

The following standard supplement addresses COL License Information Item 9.3.

The COL applicant shall provide the NRC a confirmatory critically analysis for the inadvertent placement of a fuel assembly in other than prescribed locations, as required by Subsection 9.1.2.3.1. The criticality analysis for spent fuel storage, which the inadvertent placement of a fuel assembly in other than prescribed locations is provided in WCAP 17246-P and WCAP 17375-P. The vendor information described by Subsection 9.1.2.3.1 will be provided in Holtec International Technical Report (TBD).

9.1.6.4 Spent Fuel Racks Load Drop Analysis

The following standard supplement addresses COL License Information Item 9.4.

The COL applicant shall provide the NRC a confirmatory load drop analysis, as required by Subsection 9.1.4.3. The structural analysis, including load drop analysis, the spent fuel storage racks is provided in WCAP 17331-P. The vendor information described by Subsection 9.1.4.3 will be provided in Holtec International Technical Report (TBD).

9.1.7S References

- 9.1-1 WCAP 17375 P, "South Texas Project Units 3 & 4 Fuel Storage Racks with DCD Fuel Design Criticality Safety Methodology Report," Westinghouse Electric Company, LLC. Holtec International Technical Report (TBD)
- 9.1-2 WCAP 17331 P, "Structural Analysis Report for STP Units 3 & 4 Spent Fuel Storage Rack Baseline Design," Westinghouse Electric Company, LLC. Holtec International Technical Report (TBD)
- 9.1-3 Holtec International Technical Report (TBD)

RAI 09.01.01-4

QUESTION:

Spent Fuel Racks Structural Evaluation

To address COL License Information Item 9.7, the applicant stated in FSAR Section 9.1.6.7 that a confirmatory structural evaluation of the racks will be provided in an FSAR amendment in accordance with 10 CFR 50.71(e) prior to receipt of fuel. Since structural integrity of the racks must be demonstrated under all postulated loading conditions for providing protection to the spent fuel from mechanical damage, the applicant is requested to provide details of analysis and design of the spent fuel racks using the guidance in SRP 3.8.4, Appendix D, in order for the staff to assess structural adequacy of the spent fuel racks.

RESPONSE REVISION 2:

References:

1. Letter, Scott Head to Document Control Desk, "Notification of Vendor Change for Spent Fuel Racks," U7-C-NINA-NRC-120071, dated December 6, 2012
2. Letter, Scott Head to Document Control Desk, "Revised Responses to Requests for Additional Information," U7-C-NINA-NRC-110039, dated February 28, 2011 (ML11322A157)
3. Letter from Scott Head to NRC, "Responses to Requests for Additional Information," dated May 3, 2010, U7-C-STP-NRC-100101 (ML101260118)

Response Revision 2 to RAI 09.01.01-4 is being provided as an update to reflect the change in fuel rack vendor as previously described by Reference 1. This revision supersedes the previous responses provided by References 2 and 3.

The initial response to this RAI (Reference 3) indicated that the vendor information needed to meet COL license Information Item 9.1.6.7 for the spent fuel rack (SFR) structural evaluation would be provided. Reference 1 indicated that the vendor information will be provided by Holtec International.

As a result of this RAI response, COLA Part 2, Tier 2, Subsection 9.1.6.7 will be revised (see Note below). Changes from COLA Rev.8 are indicated with grey shading as follows:

9.1.6.7 Spent Fuel Racks Structural Evaluation

The following standard supplement addresses COL License Information Item 9.7.

The COL applicant shall provide the NRC a confirmatory structural evaluation of the spent fuel racks, as outlined in Subsection 9.1.2.1.3 ~~The structural evaluation of the spent fuel racks is described in WCAP-17331-P~~ *The vendor information described by Subsection 9.1.2.1.3 will be provided in Holtec International Technical Report (TBD).*

Note: WCAP-17331-P included the load drop analysis for COL Item 9.1.6.4 and was deleted from Subsection 9.1.7S by the markup to RAI 09.01.01-3 R2 provided by Attachment 12 of this submittal.